

THE HONORABLE JAMAL N WHITEHEAD

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

IN RE VALVE ANTITRUST LITIGATION

Case No. 2:21-cv-00563-JNW

**SUPPLEMENTAL DECLARATION OF
STEVE W. BERMAN IN FURTHER
SUPPORT OF MOTION TO APPOINT
HAGENS BERMAN SOBOL SHAPIRO
LLP AND BUCHER LAW PLLC AS
INTERIM CO-LEAD CLASS COUNSEL**

This Filing Relates to:

[ALL ACTIONS]

I, Steve W. Berman, declare as follows:

1. I am an attorney duly licensed to practice law before this court. I am the managing partner of Hagens Berman Sobol Shapiro LLP, counsel of record for Plaintiffs John Elliott, Ricardo Camargo, Javier Rovira, and Bradley Smith (*Elliott* Plaintiffs) in the above-titled action. I have personal knowledge of the facts stated in this declaration and would competently testify thereto, if called upon.

2. Hagens Berman has led some of the most complicated antitrust cases relating to the two-sided markets of the last decade, resulting in billions in recovery for consumers and other two-sided market participants. For example, Hagens Berman successfully litigated comparable antitrust claims against both Google and Apple concerning their monopolization of app distribution markets.

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COUNSEL -1

1 1 *In re Google Play Store Antitrust Litigation*, No. 3:21-md-02981-JD (N.D. Cal.); *Cameron v. Apple*
 2 2 *Inc.*, No. 4:19-cv-03074 (N.D. Cal.). These matters generated \$190 million in recovery for app
 3 3 developers.

4 3. Hagens Berman also has co-led the record-breaking antitrust case against credit card
 5 giant Visa and MasterCard, which resulted in a \$3.05 billion cash settlement and injunctive relief
 6 valued at more than \$20 billion, the largest antitrust settlement in history at its time. *In re Visa*
 7 *Check/Mastermoney Antitrust Litig.*, No. 96-cv-05238 (E.D.N.Y.). In addition, Hagens Berman was
 8 appointed as interim co-lead for the consumer classes against Amazon, a two-sided e-commerce
 9 platform, in *Frame-Wilson, et al. v. Amazon.com, Inc.*, No. 2:20-cv-00424 (W.D. Wash.) and *De*
 10 *Coster v. Amazon.com, Inc.*, No. 2:21-cv-00693 (W.D. Wash.). The plaintiffs in both *Frame-Wilson*
 11 and *De Coster* have overcome multiple rounds of motions to dismiss and plaintiffs in *De Coster* have
 12 moved to certify a nationwide class.

13 4. Hagens Berman does not represent, or intend to represent, any individuals asserting
 14 claims against Valve Corporation in arbitration or any other parallel proceeding.

15 5. To assist the Court with this motion, true and correct copies of the following
 16 documents have been provided:

17 Exhibit 1	Declaration of Mary Robinson, dated November 22, 2016, submitted in <i>In re Broiler Chicken Antitrust Litigation</i> , 16-cv-8637 (N.D. Ill.)
18 Exhibit 2	<i>Maplevale Farms, Inc. v. Koch Foods, Inc.</i> , 16-cv-8637 (N.D. Ill.), Dkt. No. 248 (Order dated December 14, 2016)
19 Exhibit 3	<i>Frame-Wilson v. Amazon.com, Inc.</i> , 20-cv-0424 (W.D. Wash.), Dkt. No. 1 (Class Action Complaint)

21 6. I declare under penalty of perjury under the laws of the United States that the
 22 foregoing is true and correct.

23 DATED: January 10, 2025

HAGENS BERMAN SOBOL SHAPIRO LLP

24 _____
 25 /s/ Steve W. Berman
 26 Steve W. Berman (WSBA No. 12536)

27 Attorneys for Plaintiffs

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 COUNSEL – 2